

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
THOMAS BADERA

Plaintiff,

-against-

ERIC DEABREU,

Defendant.  
-----X

**ANSWER TO  
COUNTERCLAIMS**

07 Civ. Action No. 9721

**PLAINTIFF DEMANDS  
TRIAL BY JURY**

(Judge Robinson)

Plaintiff, THOMAS BADERA ("BADERA") by his attorneys, Greenberg & Massarelli, LLP, as and for his Answer to Counterclaims alleges as follows:

**ANSWERING A "FIRST CAUSE OF ACTION"**

1. Denies the allegations of paragraphs "Fourteenth," "Fifteenth," "Seventeenth," "Eighteenth," "Nineteenth", and "Twentieth."

**ANSWERING A "SECOND CAUSE OF ACTION"**

2. Repeats and realleges the denials as previously set forth to paragraphs "Fourteenth," "Fifteenth", "Seventeenth", "Eighteenth", "Nineteenth", and "Twentieth." in answer to the allegations of paragraph "Twentyfirst."

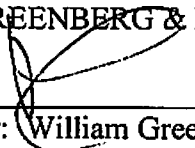
3. Denies the allegations of paragraphs "Twentysecond" and "Twentythird."

WHEREFORE the plaintiff THOMAS BADERA demands that judgment be entered dismissing the Counterclaims, along with costs and disbursements to plaintiff THOMAS BADRA.

Dated Purchase, New York  
December 12, 2007

Yours, etc.

GREENBERG & MASSARELLI, LLP

  
By: William Greenberg (WG 3838)

Attorneys for Plaintiff

THOMAS BADERA

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